

Ed Chapin (State Bar No. 53287)  
SANFORD HEISLER SHARP, LLP  
655 West Broadway, Suite 1700  
San Diego, CA 92101  
t. 619.577.4253  
e. echapin@sanfordheisler.com

Brian M. Holm, Esq. (SBN: 255691)  
HOLM LAW GROUP, PC  
12636 High Bluff Drive, Suite 400  
San Diego, California 92130  
t. 858.707.5858  
e. brian@holmlawgroup.com

John J. O'Brien (SBN: 253392)  
THE O'BRIEN LAW FIRM, APLC  
750 B Street, Suite 3300  
San Diego, CA 92101  
t. 619.535.5151  
e. john@theobrienlawfirm.com

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF SAN DIEGO – CENTRAL DIVISION**

JANE DOE NOS. 1 - 22, inclusive, individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business organization,  
form unknown; MICHAEL J. PRATT, an individual;  
ANDRE GARCIA, an individual; MATTHEW  
WOLFE, an individual; BLL MEDIA, INC., a  
California corporation; BLL MEDIA HOLDINGS,  
LLC, a Nevada limited liability company; DOMI  
PUBLICATIONS, LLC, a Nevada limited liability  
company; EG PUBLICATIONS, INC., a California  
corporation; M1M MEDIA, LLC, a California  
limited liability company; BUBBLEGUM FILMS,  
INC., a business organization, form unknown; OH  
WELL MEDIA LIMITED, a business organization,  
form unknown; MERRO MEDIA, INC., a California  
corporation; MERRO MEDIA HOLDINGS, LLC, a  
Nevada limited liability company; and ROES 1 - 550,  
inclusive,

Defendants.

LEAD CASE NO.:

Case No. 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

**DECLARATION OF JANE DOE NO. 1 IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
ORDER ALLOWING PRETRIAL  
DISCOVERY OF DEFENDANTS' FINANCES  
AND NET WORTH PURSUANT TO  
CALIFORNIA CIVIL CODE SECTION 3295**

Date: January 18, 2019

Time: 9:00am

Dept.: C-73

Judge: Hon. Joel R. Wohlfeil

**DECLARATION OF JANE DOE NO. 1**

I, Jane Doe No. 1, declare as follows:

1. I am a plaintiff in the above-captioned action. I have personal knowledge of each fact stated in this declaration.

2. In July 2015, Defendants posted an advertisement on Craigslist.com in the gigs/modeling section for the Las Vegas area, seeking young women for adult modeling. I responded to the advertisement and corresponded with defendant Andre Garcia ("GARCIA") (then going by his alias "Jonathan"). Our initial conversations were via text and/or email -- the following representations regarding distribution were conveniently by phone or in-person.

3. GARCIA told me that Defendants would not post the subject videos online and they would not distribute the videos in the United States. GARCIA told me the video would go to one private buyer overseas in Australia - and would only be in DVD format. GARCIA had me speak with another women, who assured me the videos do not get leaked.

4. Before each shoot, GARCIA and defendant Matthew Wolfe ("WOLFE") (going by his alias "Ben"), again, assured me they would not post the videos online and they would not distribute the videos in the United States. They assured her there was nothing to worry about, promised me privacy, and represented nobody I knew would see the videos.

5. WOLFE and GARCIA continued to make the above representations before and simultaneous with providing me documents to sign. GARCIA also made me alcoholic drinks, which I consumed before and during reviewing and signing documents, while confined in the hotel room for many hours. They encouraged me to drink in order to ease me up and take away the nerves. GARCIA continued to refill the glass while I got my makeup done.

6. After finishing the makeup, GARCIA asked me to take several pictures that he was going to send to the guy that the video was for to make sure my appearance was up to his standards. I tried on several outfits, and GARCIA sent pictures via his cell phone. After several of these, GARCIA indicated that the guy wanted me to shave the peach fuzz off my face before we began the shoot. When

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1 I said, are you kidding me, GARCIA told me “the owner wants it a specific way...he is the one paying  
2 you.”

3 7. After the video shoots, Defendants did not pay me in full, as they represented.

4 8. In October 2015, The Defendants released my videos on their website, [www.girlsdoporn.com](http://www.girlsdoporn.com),  
5 and other websites, which were then discovered by my high school, college, and law school friends and  
6 acquaintances – as well my family.

7 9. Also around October 2015, my contact information (social media accounts, phone number,  
8 email addresses, etc.) were released on websites, including, at least, the blog [www.pornwikileaks.com](http://www.pornwikileaks.com),  
9 where “fans” of Defendants’ website troll. As a result, I was harassed through social media, text  
10 message, and phone. People even emailed and called my college and graduate school fellow students,  
11 the faculty, and even the deans, calling me a “whore, slut, disgrace, etc.” They even sent links to and  
12 screenshots of the subject videos to the fellow students, the faculty, and the deans.

13 10. As a result of the release of the videos, I have suffered emotional distress damages (including  
14 loss of eating, loss of sleep, enduring fright, shock, nervousness, anxiety, depression, embarrassment,  
15 mortification, shame, and fear):

16 a. I have even contemplated suicide.

17 b. I cannot get these incident out of my mind. My life will never be the same. I have gone  
18 through an emotional roller coaster. This incident has ruined friendships and has caused  
19 tension in my relationships and among family members.

20 c. At times, I have randomly woken up screaming in the middle of the night. I deactivated  
21 most social media accounts because of harassing messages from strangers, calling me a  
22 “slut and whore.” I have requested a campus security guard walk me to and from my  
23 car. When at school, I have also requested a friend be with me at all times and I have  
24 hid in the bathroom during breaks between classes. I have received harassing and  
25 threatening phone calls from blocked numbers, after which I called the police and filed a  
26 report. I have been scared when left alone.

27 d. I have turned my phone off for long periods of time because I was scared and nervous to  
28 receive more harassing texts and calls. At times, especially at school, I have thrown up

1 in the bathroom 1-2 times a day due to nerves and anxiety. I have spent as little time as  
2 possible at school, especially in class with other students. I have taken depression and  
3 attention deficit medication.

4 e. I am terrified that potential employers and others will see my videos. I purposely have  
5 gone grocery shopping and done errands 30-45 minutes away to decrease the chances of  
6 seeing someone I know. I avoid school and extracurricular activities, if I can. I have  
7 considered transferring schools and am now doing a semester away from school.

8 f. I was so distraught that I could not eat and lost 10-15 lbs. My friends and family would  
9 have to force me to eat. I have fainted several times due to this incident.

10 g. If my current employer discovers the video or this case, I will lose my job.

11 11. I would never have agreed to the videos, if Defendants had been truthful, told me their plan to  
12 release my videos on their website, or told me I was in danger. I would never have agreed to the  
13 videos, if Defendants had told me their website existed. I made a mistake trusting the Defendants –  
14 they are not truthful people.

15 12. Before and during this lawsuit, I made changes to my life to minimize the harassment and other  
16 damages the Defendants have caused me. In this lawsuit, I seek the Court's help in remedying the  
17 damages the Defendants have caused me. Unsealing the Court record will likely cause me even more  
18 harm and the harassment may exacerbate and/or resurface. Unsealing the Court record will worsen the  
19 very harm I have am seeking to now remedy.

20 13. Attached hereto as Exhibit A is a text message conversation that I had with one of Defendants,  
21 whom I believe to be Garcia based on our discussions and meeting him at a later date, although he used  
22 a fake name in the email and text conversations and at the video shoots with him.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
24 true and correct.

25  
26 Date: March 7, 2017

DocuSigned by:  
By: Jane Doe 1  
Jane Doe No. 1

# **Exhibit A**

Text Message  
Mon, Jul 27, 4:33 PM

Hey [REDACTED] it's Jonathan from the shoot offer!

Hey! How are you?

Great and you? Where are you located?

Really well!!! I'm in N. Las Vegas

Ok sounds good. We can fly you down. You just want the \$4000 guy and not the solo?

Sorry I'm at work so couldn't answer

Whatever pays more

you can do both if you want and that's ok. if you want to save us both time i can send you examples of what i need. It's \$4000 for the guy and \$1000 by yourself so you can make \$5000 for the day.

Okay yeah! Can you send me examples please

Also where does the footage end up?

i'll send you the examples of the photos. What time are you off? I rather me explain everything to you over the phone. It's more professional and easier.

I'm off at 6

Ok I'll send you the examples and then I'll call you at 6. Will take 7-10min Max

Okay

Still working? call me when free please

I will, sorry

I am shooting at 8. I am sure you'll be done way before then ?

CONFIDENTIAL

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